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SAMSUNG ELECTRONICS CO., LTD.
8 **SAMSUNG ELECTRONICS AMERICA, INC.**

9 **IN THE UNITED STATES DISTRICT COURT**

10 **NORTHERN DISTRICT OF CALIFORNIA**

11 **SAN FRANCISCO DIVISION**

12 IN RE: CATHODE RAY TUBE (CRT)
13 ANTITRUST LITIGATION

Case No. 3:07-cv-05944 SC

MDL No. 1917

14 This Document Relates To:
15 ALL DIRECT ACTION COMPLAINTS
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**DECLARATION OF BENJAMIN G.
BRADSHAW IN SUPPORT OF
DEFENDANTS' REQUEST FOR
JUDICIAL NOTICE**

Date: November 30, 2012, 10:00 a.m.
(tentative)

Place: JAMS Resolution Center
Special Master: Hon. Charles A. Legge
(Ret.)

DECLARATION OF BENJAMIN G. BRADSHAW

I, Benjamin G. Bradshaw, declare:

1. I am an attorney at law admitted to the State Bar of California and admitted and duly licensed to practice before this Court. I am a partner with the law firm O'Melveny & Myers LLP, counsel of record for Defendants Samsung Electronics Co., Ltd., and Samsung Electronics America, Inc. in this action. I have personal knowledge of the facts set forth in this declaration and if called upon to do so I could and would testify competently to such matters.

2. Attached to the Request for Judicial Notice as **Exhibit 1** is a true and correct copy of the European Commission's press release publically announcing its investigation into the CRT industry, dated November 8, 2007. This document is publically available on the official website of the European Union at:

<http://europa.eu/rapid/pressReleasesAction.do?reference=MEMO/07/453&format=HTML&aged=0&language=EN&guiLanguage=en>.

3. Attached to the Request for Judicial Notice as **Exhibit 2** is a true and correct copy of the initial class action complaint in *Kindt v. Matsushita Electric Industrial Co., Ltd.*, Case No. 07-cv-10322 (S.D.N.Y. 2007), which was filed on November 13, 2007.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed on August 17, 2012, in Washington, D.C.

/s/ Benjamin G. Bradshaw
Benjamin G. Bradshaw